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May 16, 2011

Sean Sheldrake
Project Coordinator
U.S. EPA, Region 10
1200 Sixth Avenue, M/S ECL-111
Seattle, Washington 98101

Re: April 2011 Monthly Progress Report
Administrative Settlement Agreement and Order on Consent for Removal Action
U.S. EPA Region 10 Docket No. CERCLA 10-2009-0255
Gasco Sediments Site within the Portland Harbor Superfund Site

Project Number: 000029-02.28

Dear Mr. Sheldrake:

This monthly progress report provides information required by Section VIII, Paragraph 26, of the Administrative Settlement Agreement and Order on Consent for Removal Action (Order) for actions taken between April 1 and April 30, 2011, at the Gasco Sediments Site within the Portland Harbor Superfund Site.

1. ACTIONS TAKEN IN THIS MONTH AND PROBLEMS ENCOUNTERED

The following actions and correspondences occurred in this month:

- **April 1 through 30** – Prepared, completed, and prepared initial data results for the riverbank topography and in-water bathymetry survey in the Gasco Sediments Site project area.
- **April 7** – Anchor QEA, LLC, completed the monthly visual monitoring of the pilot cap area.
- **April 8** – NW Natural and Anchor QEA attended a meeting with the U.S. Environmental Protection Agency (EPA) to discuss the benthic toxicity findings from the

data gaps sampling performed as part of the EPA-approved *Final Project AIR and Data Gaps QAPP* and proposed midge toxicity re-testing.

- **April 12** – Anchor QEA submitted to EPA the proposed scope of work addendum for completing retesting of surface sediments from the Gasco Sediment Site project area for chemical analysis and midge toxicity testing.
- **April 14** – EPA conditionally approved NW Natural's April 12, 2011 proposed scope of work addendum and requested that Station U2C-2 be removed as a reference envelope station from all future data evaluations. Anchor QEA responded to the conditional approval by stating that the bioassay results from the reference sediments were never intended for use in revising Reference Envelope Values (REVs) or for any other purpose as bioassay results are interpreted using the EPA-recommended Reference Envelope Approach and associated approved REVs for use in the Portland Harbor Superfund Site. However, per EPA's request, NW Natural agreed to replace the proposed reference location U2C-2 with a reference sediment location previously used for calculating the Portland Harbor REVs.
- **April 15** – Anchor QEA submitted the monthly progress report to EPA and submitted a revised retesting scope of work that included additional surface sediment sample collection (for archive initially pending the retesting results) at eight locations to be conducted concurrent with the approved retesting fieldwork.
- **April 17** – EPA approved the revised retesting scope of work but requested that each of the proposed eight surface sediment sampling locations be analyzed for volatile petroleum hydrocarbons (VPH) and containers from these location be placed in archive (1 year holding time) for possible extractable petroleum hydrocarbons (EPH) analysis.
- **April 18 through 22** – Completion of the EPA-approved retesting scope of work addendum and concurrent collection of surface sediment samples from the eight additional locations.
- **April 19** – NW Natural clarified to EPA that VPH data obtained from the 13 surface sediment samples directed by EPA during completion of the EPA-approved *Final Project AIR and Data Gaps QAPP* sampling were completed within the standard 14-day VPH hold times. Therefore, no additional VPH analysis is necessary for these stations. NW Natural also informed EPA that there were no detections of VPH carbon groups at any of these stations. Because of the lack of detected concentrations, and because the collection of these data is inconsistent with the Portland Harbor Site process (as

described in NW Natural's detailed October 14, 2010 responses to EPA's direction to conduct EPH/VPH sampling), NW Natural believes that there are no current identified uses of these data to support the remedy design and selection process. EPA responded to NW Natural that the VPH analysis and EPH archival was directed.

- **April 20** – NW Natural agreed to complete the directed VPH analysis and archive for potential future EPH analysis in order to minimize delays in the ongoing data gaps sampling and long-term project schedule. Consistent with the previously archived EPH samples, NW Natural reiterated that sediments archived for potential EPH analysis will only be analyzed if it is determined at some later date that the data would be used consistent with the Portland Harbor Site process, including risk screening. NW Natural also reiterated that if a Portland Harbor Site use for EPH and VPH fractionation data is developed, that any Gasco data will only be used in a manner that is consistent with that Portland Harbor Site process.
- **April 25** – EPA provided NW Natural comments on the March 2011 *Segment 2 Capture Zone Field Test Report* prepared by Anchor QEA and requested responses to EPA comments within 30 days.
- **April 26** – Anchor QEA communicated to EPA that NW Natural proposes responding to EPA's comments on the *Segment 2 Capture Zone Field Test Report* by preparing a status report on the findings from the April 2011 variable frequency drive testing within the requested 30 day schedule requested by EPA (May 25, 2011). EPA approved this proposal.
- **April 28** – DEQ informed NW Natural that DEQ would not be commenting on the *Segment 2 Capture Zone Field Test Report* at this time and will consider the results of field testing Segment 2 pilot wells in the context of the overall design of the Segment 2 hydraulic control and containment system to be presented in the groundwater source control measures interim design report.

2. RESULTS OF SAMPLING, TESTS, AND OTHER DATA RECEIVED

The results of the monthly visual monitoring of the shoreline area in the direct vicinity of the pilot cap are provided as Attachment A. The results of the field sampling results obtained during completion of the EPA-approved *Final Project AIR and Data Gaps QAPP* and subsequent EPA-approved addenda will be reported in the *Draft Engineering Evaluation/Cost Analysis and Data Report*.

3. SCHEDULE OF ACTIVITIES FOR THE NEXT MONTH

Anchor QEA anticipates the following activities to occur in the next month:

- Submittal of the May monthly progress report.
- Development and submittal to EPA a status report on the findings from the April variable frequency drive testing.
- Completion of the riverbank topography and in-water bathymetry survey data evaluation.
- Completion of monthly visual monitoring of the pilot cap area.
- Submittal of a schedule update for the anticipated submittal of the *Draft Engineering Evaluation/Cost Analysis and Data Report*.
- Continued chemical analyses and benthic toxicity testing on the samples collected as part of the retesting scope of work addendum.

4. ANTICIPATED PROBLEMS AND PROPOSED RESOLUTIONS

No problems or unforeseen conditions were encountered.

Please contact the undersigned if you have any questions or require additional information.

Sincerely,



Ryan Barth, P.E.
Assistant Project Manager



Carl Stivers, Partner
Project Manager

Attachments:

Attachment A Monthly Visual Monitoring Report for Pilot Cap Vicinity

Cc:

Bob Wyatt, NW Natural

Patty Dost, Pearl Legal Group PC

Tom McCue, Siltronic Corporation

Alan Gladstone and Hanne Eastwood, Davis Rothwell Earle and Xochihua

James Peale, Maul Foster Alongi, Inc.

Lance Peterson, Camp Dresser McKee

Matt McClincy, DEQ

Dana Bayuk, DEQ



Visual Observations Log Form

Date April 7, 2011 Project Number: 000029-02 BG-28 Task 3c

Location: NW Natural "Gasco" Site

Project Name: NW Natural – Gasco

Monitoring Period: Monthly (Year 5)—April 2011

Time Observations Started: April 7, 2011 @ 14:00 Time Observation Concluded: April 7, 2011 @ 15:00

Weather Conditions: Partly cloudy, 47 degrees Fahrenheit, winds 5-15 knots from the northwest.

Wave Action Observations: Moderate to heavy wave action (0.5 - 1.5 feet in height)

Photographs Taken: ☒ Yes ☐ No

Tidal Conditions: Willamette River level on 04/07/2011 ranged from 12.85 to 13.89 feet. The Willamette River level during photos is approximately 13.70 feet measured at 14:30 (River Level Elevation Datum: Morrison Gage Height)

Observations of Erosion/Deposition: No erosion/deposition is evident along the shoreline. Due to high river water levels, the exposed organoclay mat material observed in preceding events was not visible (Photo 1).

Observations of Long-term Controls (i.e., oil booms, organo-clay mat, etc.) The Fuel and Marine Marketing (FAMM) containment boom is positioned across the cap area, between the upriver corner of the ship dock and the wooden dolphin (near the upriver extent of the site and near the Siltronic Corporation outfall). Buoys that identify the cap area to mariners are in place as installed. The position of the FAMM oil boom, warning buoys and a general overview of the site shoreline are shown in Photo 2.

Other Comments: No sheen is evident in or around the cap area. Photo 3 shows the water surface and shoreline immediately downriver of the sediment cap.

Recorded by: Douglas Laffoon

Photo 1 — *River level currently elevated above the extent of sediment cap (04/07/11):*



Photo 2 — *FAMM oil boom and mariner warning buoys in place across pilot cap area (04/07/11):*



Photo 3 — *Conditions immediately downriver of cap area (04/07/11):*

